

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Michael D. Kale

Case No. 1:19-BK-05203-HWV  
Chapter 13

MOTION TO EXTEND TIME TO  
FILE ALL REMAINING DOCUMENTS

AND NOW, this 20<sup>th</sup> day of December, 2019, come the above Debtor, by his counsel, Brent Diefenderfer, Esquire and CGA Law Firm, and file the within Motion averring that:

1. The within Motion is brought pursuant to Bankruptcy Rule 1007 in that it seeks to extend the time in which the Debtors must file the requisite Schedules.
2. The above-captioned case is a voluntary Chapter 13 petition, which was filed as an emergency on December 5, 2019.
3. Due to the emergency nature in which this petition was filed, and due to the volume of information involved in this case, there is insufficient time for the Debtor to compile the necessary information and to complete and file all remaining documents by December 20, 2019. Debtor travels out of state for work, and he is still gathering information needed to complete his Petition.
4. The Debtor request an extension of thirty (30) days to file all remaining documents.

WHEREFORE, the Debtor request an extension of time of thirty (30) days in which to file all remaining documents to accompany his bankruptcy petition.

Respectfully submitted,  
CGA Law Firm

By: /s/ Brent C. Diefenderfer  
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Chapter 13

**ORDER GRANTING MOTION TO EXTEND TIME TO  
FILE ALL REMAINING DOCUMENTS**

AND NOW, upon the consideration of the Motion filed by the Debtor seeking to have the time in which to file the requisite schedules extended, it is hereby

ORDERED that the Motion is GRANTED. The deadline for Debtor to file all remaining documents is extended an additional thirty (30) days, to January 20, 2020.

BY THE COURT,